

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

State of Oklahoma,

Plaintiffs,

v.

Tyson Foods, Inc., et. al.

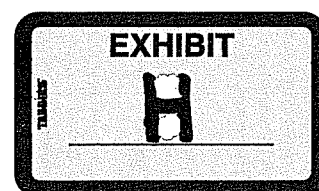
Defendants.

Case No.: 4:05-cv-00329-GKF-PJC

DECLARATION OF ROGER TOURANGEAU, Ph.D.

I, Roger Tourangeau, Ph.D., hereby state as follows:

1. I am a Research Professor with the Survey Research Center at the University of Michigan as well as a Research Professor for the Joint Program in Survey Methodology. Prior to joining the University of Michigan, I worked at the National Opinion Research Center and the Gallup Organization.
2. In 1979 I received by Ph.D. from Yale University in Psychology. I have nearly 30 years of experience in the field of research science, including survey methodology and research analysis.
3. I am one of the authors of the State of Oklahoma's expert report entitled "Natural Resource Damages Associated with Aesthetic and Ecosystem Injuries to Oklahoma's Illinois River System and Tenkiller Lake – Expert Report for State of Oklahoma, in Case No. 05-CV-0329-GKF-SAJ."
4. I have reviewed the Defendants' Motion to Compel Production of Expert Materials and Integrated Brief ("Defendants' Motion") (Dkt. #1854), as well as the accompanying Declaration of William H. Desvousges, Ph.D. (Dkt. #1854-5).



5. "Conversion" is a standard survey practice whereby individuals who initially decline participating in a survey are contacted following their initial decline for the purpose of encouraging participation.
6. With regard to the 189 individuals described on page 15 of the Defendants' Motion, Dr. Krosnick and I were the only authors of the CV Report to attempt conversion of a subset of this group.
7. Of those individuals who I was able to reach, I am unaware of any specific individual who ultimately participated in the survey.
8. I did not personally administer the CV survey to any respondents or potential respondents.
9. With regard to the claimed need by Defendants and Dr. Desvousges for the identities of participants in the main survey and the activities that preceded the main survey, I am unaware of any standard procedures in survey research that require using respondents' personal identifying information to evaluate any of the following:
 - a. bias and non-response bias;
 - b. the effect of survey questionnaire design on the interviewees' responses and the State's damages calculation;
 - c. the rationale behind selecting a CV methodology after completing the telephone survey and recreational study;
 - d. the totality of information provided to respondents during the interviews.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 23, 2009

/s/ Roger Tourangeau
Roger Tourangeau, Ph.D.